

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001**

**First-Class Mail and Periodicals
Service Standard Changes, 2021**

Docket No. N2021-1

**DOUGLAS F. CARLSON
INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS STEPHEN B. HAGENSTEIN (DFC/USPS-T3-1-12)**

May 3, 2021

Pursuant to 39 C.F.R. § 3010.311, I hereby submit interrogatories and requests for production of documents to United States Postal Service witness Stephen B. Hagenstein.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Cintron (DFC/USPS-T1-1-15) are incorporated herein by reference.

Respectfully submitted,

Dated: May 3, 2021

DOUGLAS F. CARLSON

DFC/USPS-T3-1. Please refer to your testimony at page ii. Which shapes and classes of mail does the Pennwood Place P&DC process?

DFC/USPS-T3-2. Please provide the clearance time and critical entry time for First-Class Mail parcels.

DFC/USPS-T3-3. Please provide quarterly service performance scores for the nation, as distinct from individual districts, from 1998 to the present.

DFC/USPS-T3-4. Please provide the percentage of First-Class Mail volume for which the service standard will be slowed by at least one day if the change in service standards that is the subject of this docket is implemented.

DFC/USPS-T3-5. Please provide the clearance time for outgoing Priority Mail parcels.

DFC/USPS-T3-6. Please describe the processing network for First-Class Mail parcels to the extent that the facilities that process First-Class Mail parcels differ from the facilities that process First-Class Mail letters and flats. In your response, please list the facilities that process First-Class parcels that do not also process either letters or flats and indicate the ZIP Code areas that these facilities serve.

DFC/USPS-T3-7. Please describe the processing network for Priority Mail and identify the facilities that process Priority Mail and the ZIP Code areas that these facilities serve. Please also identify differences between origin service areas and destination service areas for these facilities.

DFC/USPS-T3-8. Please refer to your testimony at page 13, lines 16–19. Please explain why some processing facilities cannot meet the 02:00 clearance time, and please explain whether consolidations of outgoing mail processing into those facilities from other facilities that processed outgoing mail in the past are a factor in the inability of some processing facilities to meet the 02:00 clearance time.

DFC/USPS-T3-9. Please provide a list of Surface Transportation Centers and the ADCs, SCFs, or other facilities that each STC serves.

DFC/USPS-T3-10. Please provide, separately, the percentage of the volume originating at the following P&DCs for which the First-Class Mail service standard will increase by one day, two days, and, if applicable, three days.

- a. Boston MA
- b. New York NY
- c. Miami FL
- d. Houston TX
- e. Chicago IL
- f. Seattle WA
- g. Portland OR
- h. San Francisco CA
- i. Los Angeles CA
- j. Honolulu HI
- k. Anchorage AK

DFC/USPS-T3-11. Please refer to Figure 8 on page 26 of your testimony. Please provide the origin-destination pairs that comprise the 34 percent of origin-destination pairs for which the mail would travel by air if the change in service standards that is the subject of this docket is implemented.

DFC/USPS-T3-12. Please identify the reasons why First-Class Mail fails to be delivered within the service standard and the approximate proportion of the failures that each reason causes.